

REMARKS

Claims 1-42 are pending in the present application. The Examiner is maintaining the rejection of claims 4-5, 11-12, and 35 under 35 U.S.C. §112, second paragraph, claims 1-9, 11, 13-20, 22-35, 37, and 39-41 under 35 U.S.C. §102, and claims 10, 12, 21, 36, 38, and 42 under 35 U.S.C. §103. Applicant has amended claims 4, 11-12, and 35, and has canceled claim 5. No new matter is introduced. Applicant notes that, in response to the Examiner's request for clarification of a grammatical error in the response filed August 17, 2005, that no claim amendments were submitted or intended in the aforementioned response.

Section 112 Rejections

Claims 4-5, 11-12, and 35 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite. The Examiner objected to the terms "relevant" and "non-relevant" as being relative terms not defined by the claim or the specification. Applicant has canceled claim 5, and has deleted the word "non-relevant" from claim 4, 11-12, and 35. With these amendments, Applicant urges that claims 4, 11-12, and 35 are not indefinite. Reconsideration and withdrawal of these rejections are respectfully requested.

Section 102 Rejections

Claims 1-9, 11, 13-20, 22-35, 37, and 39-41 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,185,625 (Tso, *et al.*).

Applicant urges that independent claims 1, 28 and 29 are not anticipated by Tso for at least the reasons presented below.

In the response dated August 17, 2005, Applicant explained that Tso does not disclose or suggest constructing a DOM. The sections of Tso cited by the Examiner disclose compressing or scaling a document, requesting an object from a cache, a pop-up window enabling a user to indicate whether scaled or original content is desired, and a network client enabled to control a service provider for decompressing and/or translating different types of data content. The scaling disclosed in Tso includes reduction of content dimension, reduction of content quality through compression, and translation of content to a more efficient representation format, and combinations thereof.

In the Final Office Action, the Examiner concedes that Tso does not explicitly disclose constructing a Document Object Model, but alleges that HTTP/HTML documents include Document Object Models, and cites pages 7-8 of Applicant's specification as "proof" that HTTP/HTML documents always include Document Object Models.

Applicant respectfully disagrees, and urges that the Examiner is incorrect in asserting that HTTP/HTML documents always include Document Object Models.

Applicant notes that the document object model (DOM) is a programming interface for documents formulated by the World Wide Web Consortium. It specifies a tree-like logical structure for documents and identifies the interfaces and objects used to represent and manipulate a document, the semantics of these interfaces and objects, including both behavior and attributes, and the relationships and collaborations among these interfaces and objects. The functionality specified for the DOM Core API allows software developers and web script authors to access and manipulate parsed HTML and XML content inside conforming products by creating an object model of the content of the web document. The DOM API is intended for use with programming languages such as C++ and Java to allow application programs to build a DOM of a web document. Thus, although a DOM can be built for any HTTP/HTML document, such documents do not automatically include associated DOMs. Thus, a DOM has a very specific structure, and as stated in Applicant response dated August 17, 2005, Tso nowhere discloses or suggests forming a tree-like logical structure for a document.

Moreover, the section of Applicant's specification cited by the Examiner, pages 7-8, describes the functionality of an embodiment of Applicant's invention, wherein a DOM is constructed for an input document for filtering the input document. A description of one aspect of an embodiment of Applicant's invention is not a reasonable basis for the Examiner's position that HTTP/HTML documents always include a DOM representation of that document.

In addition, the Examiner alleges that Tso discloses the functionality recited in Applicant's claims 1, 28, and 29. However, Applicant's functionality includes, e.g., *constructing an input Document Object Model (DOM) based on a document corresponding to the request; . . . filtering the input DOM to obtain a filtered DOM*, as essentially recited in claim 1, and *a differential DOM decoder adapted to receive the filtered DOM and identify and output changed data with respect to the inputs DOM*, as essentially recited 28, and 29. None of this functionality is disclosed or suggested in Tso.

The sections of Tso cited by the Examiner as disclosing *constructing a . . . DOM* (col. 6, lines 22-45, col. 8, lines 56-67, col. 11, lines 6-16, and col. 12, lines 20-45) instead disclose compressing or scaling a document, requesting an object from a cache, and a pop-up window enabling a user to indicate whether scaled or original content is desired.

The section cited as disclosing *filtering the input DOM . . . based on at least one pre-specified rule* (col. 6, lines 23-53, col. 19, lines 44-59, and col. 4, lines 17-50) instead discloses changing content by compression and/or scaling.

The section cited as disclosing *a differential DOM decoder adapted to receive the filtered DOM and identify and output changed data with respect to the inputs DOM* (col. 13, line 50 to col. 14, line 15) discloses instead a network client enabled to control service provider for decompressing and/or translating different types of data content.

Thus, for the reasons presented above, Applicant urges that Tso does not anticipate claims 1, 28 or 29. Reconsideration and withdrawal of these rejections are respectfully requested.

Claims 2-9, 11, 13-20, 22-35, 37 and 39-41 all depend from claims 1 or 29, and are thus patentable for at least the same reasons as claims 1 and 29. Reconsideration and withdrawal of these rejections are respectfully requested.

Section 103 Rejections

Claims 10 and 12 were rejected under 35 U.S.C. §103 as being obvious over Tso in view of published Paciello, “Access to Electronic Information by People with Disabilities”, IEEE, pg. 235-239, 1997. Claims 10 and 12 depend from claim 1. However, as stated above, Tso alone does not disclose all of the limitations of claim 1, and Paciello does not remedy these defects. Thus, Applicant urges that a *prima facie* case of obviousness of claims 10 and 12 over Tso and Paciello cannot be maintained. Reconsideration and withdrawal of these rejections are respectfully requested.

Claims 21 and 38 were rejected under 35 U.S.C. §103 as being obvious over Tso in view of U.S. Patent No. 6,768,999 (Prager, et al.). Claim 21 depends from claim 1, and claim 38 depends from claim 29. However, as stated above, Tso alone does not disclose all of the limitations of either claim 1 or claim 29, and Prager does not rectify these defects. Thus, Applicant urges that a *prima facie* case of obviousness of claims 21 and 38 over Tso and Prager cannot be maintained. Reconsideration and withdrawal of these rejections are respectfully requested.

Claims 36 and 42 were rejected under 35 U.S.C. §103 as being obvious over Tso in view of U.S. Patent No. 6,424,945 (Sorsa). However, as stated above, Tso alone does not disclose all of the limitations of claim 29, and Sorsa does not rectify this defect. Thus, Applicant urges that a *prima facie* case of obviousness of claims 36 and 42 over Tso and Sorsa cannot be maintained. Reconsideration and withdrawal of these rejections are respectfully requested.

CONCLUSION

Applicant urges that claims 1-42 are in condition for allowance for at least the reasons stated. Early and favorable action on this case is respectfully requested.

Respectfully submitted,

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